

**Question & Answer Session**  
**CWNS 2008 Training: Documenting Small Community Needs**  
**December 11, 2008**

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Q: Will this power point presentation be downloadable to participants directly?

A: Yes. Presentations (in pdf) and recordings of the web seminars are available at <http://www.epa.gov/cwns/webseminar.htm> are posted on our website. If you would like the presentation as a PowerPoint file, please contact [cwns@epa.gov](mailto:cwns@epa.gov).

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Q: In 2004, small systems were defined as  $\leq 3,500$ . Does the 10,000 figure represent a policy change?

A: For CWNS 2004, small community numbers, for the most part, reflect the less than 10,000 population figure. The information in the presentation is based on the less than 10,000 figure. In the 2004 Report to Congress, the appendices will report on needs for communities of less than 3,500 and less than 1,000.

For 2004, only communities with population less than 3,500 were permitted to report their needs using the small community needs form. For 2008, the threshold to use the small community form is being increased to include communities with less than 10,000 persons.

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Q: During the 2004 CWNS, most of the documentation available for small community needs was not acceptable for entry into the CWNS which resulted in significant under reporting. What has been changed for the 2008 CWNS to help this problem?

A: For 2008, the Small Community Form is available to use as documentation for communities under 10,000. This simplified method of submitting needs is now available for a greater number of communities. EPA has also updated the pre-approved Small Community Form. It will be available as a blank form and, within the Data Entry System, a form pre-populated with the most recent data available in the system. For all types of needs is, EPA has a pre-approval process, because in 2004 needs collected and entered into the system were found to be unacceptable. The States have the opportunity to present proposed methodology to EPA for pre-approval. The first pre-approval period is until December 15, 2007. EPA will open up another period at the end of February to review methodologies, provide feedback on those methodologies, and approve methods in advance of entering needs. Also, EPA has increased the list of approved document types that can be used in 2008. Some of the document types that weren't acceptable in 2004 may now be acceptable. For more information on that, the CWNS Documentation webcast is on the Internet; you can download the PDF or view the recorded presentation

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Q: As we're entering data needs into the survey for our various communities, do we need to do anything extra to be designated as a small community, or does that happen automatically based on the population we enter?

A: No, you don't actually have to do anything specific when you enter the population into the system. If the population is less than 10,000, the community will automatically be considered a small community. Then the alternative documentation will be acceptable.

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Q: Are tribal communities surveyed?

A: No. The Indian Health Service has its own survey for wastewater treatment. It is a separate process. We don't want to double survey and overburden the tribal communities. There is the option in the data entry system to identify that the facility/project is tribal, if State CWNS Coordinators want to track tribal needs.

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Q: When the connections were "ineligible" the costs were put in the SSEs (State Separate Estimates). Does it mean that these costs can be transferred back up to the Federal costs?

A: *In 2004, Separate State Estimates (SSEs) were entered needs that didn't meet one or more of CWNS eligibility requirements. The States had the option to keep them in the databases as Separate State Estimates, both for internal State use, as well as for inclusion in the CWNS Appendix that summarizes SSEs.*

*Yes, these needs can be transferred to Federal needs for CWNS 2008 because of the broaden eligibility requirements. This is very easy in the 2008 system. It is just a matter of one click, to change the status from "SSE" to "Federal."*

*It should be noted that the terms are changing for the 2008 report. It will be "Official Needs" and "Unofficial Needs". This change is part of our effort to make the Needs Survey more understandable by the non-CWNS experts.*

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Q: Is the cut-off for Small Communities 10,000 and fewer OR fewer than 10,000? It is stated both ways in the presentation.

A: *Fewer than 10,000 and apologies for any conflicting information in our presentation.*

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Q: Where can you find cost curves?

A: *Access to the cost curves at the end of January 2008 will be available to the State CWNS Coordinators within the data entry system. For others interested in seeing the cost curves at the end of January, we will have documentation available to document what the various cost curves and their equations. Non-CWNS Coordinators will not have direct access to the cost curves due to related training issues.*

*On Tuesday, December 18 at 1-3 ET, Mr. Mark Sievers (Tetra Tech), who is a member of our Tetra Tech review team, will be presenting the Cost Curve Overview web seminar.*

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Q: Will there be a way for a state to print a small community survey form for all communities at one time, or will the state have to go in and select each facility individually?

A: *Yes. There will be a way to print them all at once. You can go into the system, select as many small communities as you want, and then have all the forms printed out at one time.*

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Q: For small decentralized systems, they are generally not publicly owned and there is no "local government official" who signs the form in this case?

A: *In working with the decentralized community, it seems that it varies from State to State and how a decentralized onsite is permitted or managed. Whether or not the system is publicly-owned, in many States it seems that there is a local authority that provides permits or other assistance. That authority (e.g., county or regional health agency) could provide that signature to justify the local government official. If there is no authority issuing permits or providing assistance for decentralized systems, contact your State and/or EPA to figure out who the right person may be to justify needs.*

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Q: Do you have any suggestions on how small communities can pay to perform the Needs Survey?

*A: EPA is trying to make this, particularly, with the small community form, something that small community personnel can easily fill out without need to spend a lot of time and money.*

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Q: Are states encouraged to use EPA's methodology (i.e., the EPA approved survey which will become available in Jan 22, 2008) or come up with their own?

*A: In most cases, States will find it easier to use EPA's form. There are a few States that expressed interest in using their own forms, primarily for reasons of having one integrated form that they can send to both small communities and non-small communities, but, in general, it is probably easiest for States to use the EPA form.*

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Q: You said only coordinators will have cost curve access. Will the cost curves be available for other (non CWNS) applications in the future or are they proprietary. What will the documentation describe?

*A: The documentation will have both the background and the cost curves, as well as, how they were developed and the equations. They are straight-forward equations. So, anyone can put them on a spreadsheet or on software to use those cost curves. That will be included in the documentation in January 2008.*

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Q: How's the final agenda coming for the Kick-off meeting?

*A: We have an updated version being posted on the Internet this week. The agenda is set about 85-90% at this point. Information on eligibility, documentation rules, and related topics will be on day one; the Data Entry System training is on days two and three.*

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Q: Is the less than 10,000 population determined by the 2000 census?

*A: No. It is based on whatever population information is most currently available to the State Coordinator. We do have State level data checks for population. For present population, we look at the census 2000 information and make sure that for all the facilities across the State the total population does not add up to more than what is in the census 2000. Similarly, for projected population, we will get the 2028 census information and make sure all facilities across the State that the future population is not more than what is projected by the Census for 2028.*

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Q: What do you see as RCAP's (Rural Community Assistance Partnership) Role in 2008?

*A: RCAP can always play a very important role with the communities, making them aware of the Needs Survey and its importance. RCAP is out there working and interacting with the communities. It has an opportunity to publicize that the Needs Survey process is going on, why it is important, and how communities can participate. It can also work with the communities to find the forms and enter the information. It can also coordinate with the State Coordinator to make sure that the data gets entered and submitted to EPA.*

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Q: What's the latest on the 2004 Report to Congress?

*A: The report undergoing final management clearance at the President's Office of Management and Budget (OMB). When EPA received approval from OMB, the report will be submitted to Congress.*